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Attorneys for Party in Interest
Enel Green Power North America, Inc.

UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

In re:

PG&E CORPORATION

- and -

**PACIFIC GAS AND ELECTRIC
COMPANY,**

Debtors.

Bankruptcy Case
No. 19 - 30088 (DM)

Chapter 11

(Lead Case)
(Jointly Administered)

**NOTICE OF HEARING ON ENEL
GREEN POWER NORTH AMERICA'S
(I) MOTION TO CONFIRM SAFE
HARBOR PROTECTION UNDER
11 U.S.C. §§ 362(b)(6) AND 556; AND
(II) MOTION TO FILE UNDER SEAL**

- ☐ Affects PG&E Corporation
☒ Affects Pacific Gas and Electric
Company
☐ Affects both Debtors

**All papers shall be filed in the Lead Case,
No. 19-30088 (DM).*

Hearing Date: **March 12, 2019**
Time: **9:30 a.m.**
Courtroom: Hon. Dennis Montali
450 Golden Gate Avenue
16th Floor, Courtroom 17
San Francisco, CA 94102

Objections Due: **March 5, 2019, 4 p.m.**

PLEASE TAKE NOTICE that Enel Green Power North America, Inc. ("Enel") has filed
a motion to confirm safe harbor protection under 11 U.S.C. §§ 362(b)(6) and 556 (the "Safe
Harbor Motion" Dkt. 481), and a motion to file certain contracts and related filings under seal

Notice of Hearing on Enel's Safe Harbor Motion and Motion to File Under Seal - Case No. 19-
30088 (DM)

1 (the “Motion to File Under Seal,” Dkt. 483, and together with the Safe Harbor Motion, the
2 “Motions”).

3 **PLEASE TAKE FURTHER NOTICE** that the Motions are each based on the
4 Memorandum of Points and Authorities annexed thereto, respectively, the Declaration of
5 Giovanni Bertolino filed in support of the Motions [Dkt. 484], the complete files and records of
6 the referenced matters, the arguments of counsel, and such other and further matters as this Court
7 may consider at or before any hearing on the Motions.

8 **PLEASE TAKE FURTHER NOTICE** that the Motions are set for hearing on **March**
9 **12, 2019 at 9:30 a.m. (PST)** before the Honorable Dennis Montali at the United States
10 Bankruptcy Court for the Northern District of California, San Francisco Division, located at 450
11 Golden Gate Avenue, 16th Floor, Courtroom 17, San Francisco, CA 94102.

12 **PLEASE TAKE FURTHER NOTICE** that any responses or objections to the Motions
13 shall be in writing, shall conform to the Federal Rules of Bankruptcy Procedure and the Local
14 Bankruptcy Rules for the Northern District of California, shall be filed with the Bankruptcy Court
15 in accordance with the customary practices of the Bankruptcy Court, and shall be served on (i) the
16 Chambers of the Honorable Judge Dennis Montali, United States Bankruptcy Court for the
17 Northern District of California, 450 Golden Gate Ave, 16th Floor, Courtroom 17, San Francisco,
18 CA 94102; (ii) counsel for the Debtors, Weil, Gotshal & Manges, 767 Fifth Avenue, New York,
19 NY 10153-0119, Attn: Stephen Karotkin, Jessica Liou and Matthew Goren, and Keller &
20 Benvenuti LLP, 650 California Street, Suite 1900, San Francisco, CA 94108, Attn: Tobias S.
21 Keller, Jane Kim; (iii) the Office of the United States Trustee, 450 Golden Gate Avenue, 5th
22 Floor, Suite #05-0153, San Francisco, CA, 94102, Attn: James L. Snyder, Timothy Laffredi; (iv)
23 each member of the Official Committee of Unsecured Creditors specified in the Notice of
24 Appointment of the Official Committee of Unsecured Creditors [Docket 409], or proposed
25 counsel for the Official Committee, once such counsel has been proposed; (v) each member of the
26 Official Committee of Tort Claimants specified in the Notice of Appointment of the Official
27 Committee of Tort Claimants [Docket No. 453], or proposed counsel for the Official Committee,
28 Notice of Hearing on Enel’s Safe Harbor Motion and Motion to File Under Seal - Case No. 19-
30088 (DM)

1 once such counsel has been proposed; (vi) counsel for Enel, Stoel Rives LLP, Attn: Gabrielle
2 Glemann (gabrielle.glemann@stoel.com), 600 University Street, Suite 3600, Seattle, WA 98101;
3 and (vii) all parties requesting notice in these chapter 11 cases pursuant to Rule 2002 of the
4 Federal Rules of Bankruptcy Procedure, so as to be so filed or received no later than **March 5,**
5 **2019, at 4:00 p.m. (PST)** (the "Objection Deadline").

6 **PLEASE TAKE FURTHER NOTICE** that reply papers in further support of the
7 Motions must be filed and served no later than **12:00 p.m. (PST) on March 8, 2019.**

8 **PLEASE TAKE FURTHER NOTICE** that failure to properly file and serve an
9 opposition may be deemed consent to the relief requested in the Motions or a waiver of any right
10 to oppose it.

11
12 Dated: February 19, 2019

STOEL RIVES LLP

13 By: /s/ Gabrielle Glemann
14 Gabrielle Glemann

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